

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CURTIS WELLS)	
)	
Plaintiff,)	
)	
v.)	Civ. Act. No. 1:22cv140 (MSN-IDD)
)	
JAVIER FUENTES, <i>et al.</i>)	
)	
)	
Defendants.)	

COUNTY OF ARLINGTON AND ARLINGTON COUNTY POLICE DEPARTMENT'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Defendants, County of Arlington and Arlington County Police Department, by counsel, moves this Court to dismiss with prejudice Plaintiff's Complaint as against them pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim and for the reasons stated in Defendants' Memorandum of Law, which is filed with this Motion and incorporated by reference.

Therefore, County of Arlington and Arlington County Police Department move this Court to grant their Motion to Dismiss, with such other relief as is just and proper.

Respectfully Submitted,

COUNTY OF ARLINGTON AND
ARLINGTON COUNTY POLICE
DEPARTMENT

By Counsel

MINHCHAU N. CORR, County Attorney

_____/s/_____
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Counsel for County of Arlington and Arlington County Police Department

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of June, 2022, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of such filing to all registered users.

_____/s/_____
Ryan Samuel
Deputy County Attorney